



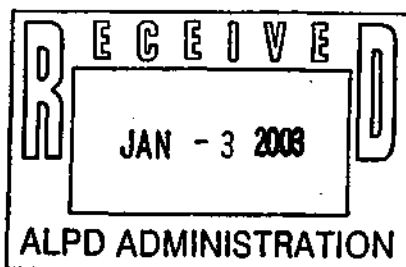
Missouri Department of Health and Senior Services

P.O. Box 570, Jefferson City, MO 65102-0570 Phone: 573-751-6400 FAX: 573-751-6010

Ronald W. Cates
Interim Director



Bob Holden
Governor



Site: Herculaneum Lead
ID #: MOD006266373
Break: 2.0
Other: 1/3/03
A717 9D

January 3, 2003

Mr. Jim Werner, Director
Air and Land Protection Division
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102

RE: Reoccupation of residences in Herculaneum, Missouri

Dear Mr. Werner:

40172707



SUPERFUND RECORDS

We have recently received a copy of a letter from Mr. Clifton Gray of the Doe Run Company to Ms. Denise Jordan-Izaguirre of the Agency for Toxic Substances and Disease Registry requesting her "perspective from a health agency standpoint" about the possibility that Doe Run be allowed to rent Herculaneum homes they own that are presently vacant, but which they claim have been cleaned (copy attached).

We believe it is important that the Department of Natural Resources (DNR) be provided the Missouri Department of Health and Senior Services' (DHSS) opinion about the human health risk possible from reoccupying these residences. This is consistent with our working relationship in which DHSS provides health/risk assessment public health consultation to DNR so they may make appropriate risk management choices.

At the present time, we do not have enough information regarding this subject to render a public health opinion. Our reasons for this are:

1. The source of the contamination still exists. The smelter is still operating; and thus still emitting lead and other metals;
2. We cannot determine if recontamination will occur or the rate of recontamination because the recontamination studies underway in Herculaneum, MO are not complete;
3. We have not been provided any post-cleanup interior sample analysis data for the homes in question; and

www.dhss.state.mo.us

The Missouri Department of Health and Senior Services enhances quality of life for all Missourians by protecting and promoting the community's health and the well-being of citizens of all ages.

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Mr. Jim Werner, Director
January 3, 2003
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4. The workgroup tasked with determining site-specific clean-up levels and cleaning methods has not provided an opinion about how clean the homes ultimately need to be or what cleaning method(s) needs to be implemented to reach these levels.

Given the above, we simply do not have enough data to formulate a scientifically justified public health opinion on the reoccupation of these vacant homes. If you have any questions, please feel free to contact Mr. Scott Clardy at (573) 751-6111.

Sincerely,



Bryant McNally, J.D., M.P.H.
Director, Division of Environmental Health
and Communicable Disease Prevention

WBM:SAC:GMC

Attachment

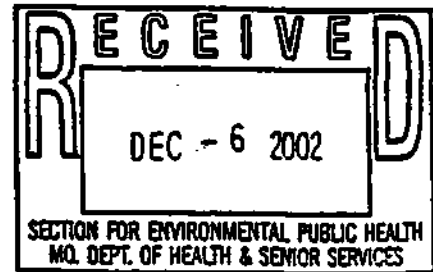
cc: Dave Mosby, DNR
Shelley Woods, AGO
Denise Jordan-Izaguirre, ATDSR
Gene Gunn, EPA
Scott Clardy, DHSS
Barbara Wood, DHSS

**THE
DOE RUN
COMPANY**

Herculaneum Smelting Division

Clifton W. Gray
Vice President Primary Smelting
General Manager
cgray@doerun.com

December 3, 2002



Denise Jordan-Izaguirro
Senior Regional Representative
ATSDR Region VII
Robert J. Dole Federal Courthouse
500 State Avenue, Suite 182
Kansas City, Kansas 66101

RE: Rental Of Housing In Herculaneum

Dear Denise:

As I promised to you, I am writing to explain Doe Run's interest in re-renting properties. We would like to understand if there is a reason why Doe Run cannot rent our properties.

Our thought is that we would like to rent the properties within the property purchase area out to generate some income to help pay for upkeep and to be fair to the neighbors who do not want to live next to a vacant home. At this time, and until the potential re-contamination issues are resolved, we would only rent to adults. Leases could be limited until January 2005 in case it is decided that we will not be able to rent or sell the properties in the long run.

"Following the purchase of a home, Doe Run shall leave the residence vacant until such time as either Doe Run demolishes the residence or the re-deposition studies, which will use monitoring that begins after June 1, 2002, are complete and the Department of Health and Senior Services, the MDNR, the City and Doe Run agree re-occupancy of a residence is not a risk to human health."

"Upon notification, MDNR, in consultation with the Missouri Department of Health and Senior Services may approve exceptions to any residency prohibition requirements of the Settlement Agreement or the Purchase Plan on a case-by-case basis."

881 Main Street, Herculaneum, Missouri 63048
Telephone: (636) 933-3187
Fax: (636) 933-3136

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EPA has been saying that re-contamination has not been occurring in the yards at this point. I would appreciate your perspective from a health agency stand point.

Thank you for your assistance.

Cordially,



Clifton W. Gray
Vice President Primary Smelting & General Manager
The Doe Run Company
Herculaneum Smelting Division

CWG/bw

cc: Scott Clardy